

**Federal Defenders
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February 18, 2020

Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *United States v. Darrell Woodford*, No. 18-cr-654

Dear Judge Matsumoto:

I am writing in advance of sentencing for Mr. Woodford on one count of ammunition possession. Sentencing is set for March 16, 2020.¹

When Mr. Woodford was arrested he was only 18 years old. Because he looks older than his years, it can be easy to forget the reality that he is still a teenager, even today, after spending the past year and a half incarcerated. Over the past year, he has matured at such a quick pace that he even took his legal team by surprise: changing from planning for a speedy trial, to pleading guilty to possessing ammunition, to writing a letter to your Honor fully taking responsibility for his terrible decisions that led to his shooting another young person. In other words, in the past year, he went from not being able to admit his actions at all, to being able to articulate both how things went so wrong that night and how to prevent that from ever happening again. He reflects about the victim and how he must feel every night.

¹ Attached to this letter are

Ex. A., letters from:

- Darell Woodford
- Rachel Bass, chief paralegal at the Federal Defenders of New York
- Deanna Woodford, Darell's aunt
- Maxine Middleton, Darell's grandmother
- Celaine Jean, Darell's friend
- Nicole Ellington, Woodford family friend

Ex. B., GED, alternative to violence, and card making course certificates

This rapid shift from impulsivity to self-reflection and more reasoned decision-making is common in youth and underscores Mr. Woodford's high capacity to change and emerge from prison a responsible young man, even after a relatively short sentence. Because of his youth, growing maturity, and full acceptance of responsibility, I respectfully urge your Honor to sentence Mr. Woodford below the guidelines.

I. Mr. Woodford's traumatic childhood with little adult supervision.

“After she passed, life was vicious.”

– Darell, talking about his mother dying in front of him.

Mr. Woodford's young life has been marked by trauma. His mother, who was raising him on her own, died in front of him when he was only about 5 years old. One morning, he woke up wanting doughnuts, but instead, saw his mom fall out of bed and begin to shake. PSR 36. He had no idea what was happening. He tried and failed to find a neighbor and then called 911 himself.

He is still dealing with this loss. As he put it, “The older I got, the more I realized she was really gone. And that's when I stopped caring about myself and my future.” Still a child, Mr. Woodford gave up on himself.

It's not hard to see why. After his mother died, his home life became unstable. His father, who was only 19 years old when Darell was born, was just not equipped to take on the role of a parent. His father sold drugs during Darell's childhood and was in and out of jail. Nonetheless, young Darell “thought [his father] was cool... We have the same name, and I thought I was supposed to be just like him. That's why I spent so much time on the street.” Instead of teaching Darell to be a responsible young man, his father introduced Darell to marijuana and crime.

At home, Darell would be beaten by family so often that he became scared to return for fear of the abuse, staying out late to wait until everyone was asleep. When he got out of one bad situation, and the family moved him to Buffalo to stay with his grandfather, he fell into another: it turned out his grandfather was abusing cocaine, and using the money sent to Darell as a death benefit from his mom to support his habit. PSR ¶ 38.

The women in his life, his grandmother Maxine and his aunt Deanna, loved him and still support him. But his grandmother just couldn't give him the attention

and care that he craved because she had to work three jobs to hold the family together. She was “always going to work.” And, Deanna, who is only 6 years older than him, was his de facto parent, playing the role of mom, aunt, and sister, even though she was also a child. She writes, “I took him out, picked him up from school, helped him with his homework, and looked after him...I really had to take care of him.” Deanna is still taking on the role of parent, coming to court, speaking to Mr. Woodford’s legal team, and talking to him at MDC.

Now, he is able to recognize that his grandmother’s work showed her love and that she did all she could, saying “She’s a hard working woman. I respect her, and I love her.” But as a child, it still meant that he was without adult supervision.

“Since I was a kid, I was in an environment of people who were young and didn’t care. ...it was what I would see every day...My grandma would tell me about seeing people shot on the block...I didn’t realize it’s not normal.”

– Darell writing about his neighborhood.

For Darell growing up, violence was common. A friend was stabbed to death when Darell was only 14 years old. Shootings happened regularly. He carried a gun because he thought he needed it to protect himself. As he saw it, in his neighborhood, he had to be prepared to shoot or be prepared to be shot.

As a young teenager, without adult supervision, he looked for community in the wrong places. Deanna saw him start to hang out with other kids who were bad influences, explaining “He was trying to escape, to cope with what was bothering him [from having no parents], and he didn’t know how to express himself. He was looking for acceptance while trying to find himself.” He was looking for people to “connect with” and a “place of belonging” and, in “the environment we were raised in, it’s common to find people who don’t have their dads in their life, or their moms.” Unfortunately, he found people to connect with in similar situations that were into bad things.” His friend Celaine describes this similarly, saying that “he knows that his environment is the root of the issue.”

II. Mr. Woodford’s growing maturity into a responsible young man.

“Before August 30, 2018, I never thought my life had any value. No one had ever told me my life had value. Talking to older guys here... showed me my life had value.”

-Darell, reflecting on how living with adult men at MDC has changed him.

Darell is now on the cusp of turning 20 years old. His time at MDC has been markedly different than his time at the youth facility he was in before, which was with other kids. Living with adult men for the first time in his life, including some men who have spent vast chunks of their lives incarcerated, has made him realize that he does not want that for himself. He does not want to waste his life. Importantly, he has also realized that the choice is his to make.

At MDC, he has managed to thrive. As Ms. Bass, the chief paralegal at the Federal Defenders, describes it, he “seems to know everyone” there, correctional staff and fellow incarcerated individuals, and they all appear to respect him. She has seen him engaged in long conversations with correctional officers, and other clients have told her what a great guy he is. He is able to “connect with others in a meaningful way.” Ms. Bass has also watched him grow from an “uncommunicative” kid into a young adult who cares about the world and what he can do to contribute to it.

Deanna has seen this change: “I know this was a situation that really woke him up. It gave him the reality check he needed, and showed him this is not who he is, and this is not where he wants to be.” And Darell himself recognizes that he has matured. In talking to Ms. Bass, he recognizes that he was unable to reflect and open-up in conversations with her until recent months. When rereading the letter he wrote to Your Honor, he said that he had surprised even himself that he was able to fully accept what he had done, start to explore why he made such a terrible decision on August 30, and to put into words the trauma he must have caused his victim.

The letters from Darell’s family and friends also support that he has many inherent qualities he will be able to rely on to succeed when he is released. A family friend describes him as “bright, intelligent, loyal, caring and loving.” His grandmother talks about how he has always “helped [her] take care of his siblings.” His best friend calls him “warm hearted” and says that he is an “extremely encouraging person” who is “reliable” and always “willing to help.” He has dreams for his future, to get his GED and continue to explore his passion for music. As Deanna writes, he has the “potential to do better” and the “chance to fix his life.” He is already “starting to make a change.”

III. A below guideline sentence is appropriate.

Mr. Woodford recognizes that his actions in this case are extremely serious. However, the guidelines of 78 to 97 months, 6 and a half to 8 years, are longer than

necessary to serve the goals of sentencing, given Mr. Woodford's youth and high capacity to change.

A. The Court should take into account that Mr. Woodford was only 18 years old when he committed the crime and has the strong ability to change in the next few years.

There are well-documented reasons why young people should be treated more leniently at sentencing than mature adults. Biologically, a young person's brain is still maturing in ways that affect judgment, and an appreciation of risks and consequences. At the same time, youth have a greater capacity to change and grow than adults do. Youth, therefore, have both a "lessened culpability" and a greater "capacity to change." *See Graham v. Florida*, 560 U.S. 48, 68, 74 (2010). The Supreme Court has explained that:

Immaturity at the time of the offense conduct is not an inconsequential consideration... While age does not excuse behavior, a sentencing court should account for age when inquiring into the conduct of a defendant.

Gall v. United States, 552 U.S. 38, 58 (2007).

Over the last decade or so, a growing body of research "has demonstrated that adolescence is a period of continued brain growth and change" because

[t]he frontal lobes, homes to key components of the neural circuitry underlying "executive functions" such as planning, working memory, and impulse control, are among the last areas of the brain to mature; they may not be fully developed until halfway through the third decade of life.

See Johnson, et al., Adolescent Maturity and the Brain, J. Adolescent Health 2009; Miller v. Alabama, 132 S.Ct. 2455, 2465 n.5 (2012) ("It is increasingly clear that adolescent brains are not yet fully mature in regions and systems related to higher-order executive functions such as impulse control, planning ahead, and risk avoidance") (citation omitted).²

² See also Nitin Gogtay et al., *Dynamic Mapping of Human Cortical Development During Childhood Through Early Adulthood*, 101 Proc. Nat'l Acad. Sci. 8174, 8177 (2004); Linda Spear, *The Behavioral Neuroscience of Adolescence* 108-111 (2009); Antoine Bechara et al., *Dissociation of Working Memory from Decision Making Within the Human Prefrontal Cortex*, 18 J. Neurosci. 428, 428, 434 (1998) (prefrontal cortex is necessary for decision-making in tasks involving evaluation of risk and reward); Antonio R. Damasio

Mr. Woodford's young life embodies these concepts. He didn't plan to hurt someone on August 30: He had a gun to "protect" himself and the shooting "happened in the heat of the moment." He describes feeling "like if I didn't do it to him, he would have done it to me." He adds, "that doesn't excuse what I did – not at all."

Right after the shooting, he resisted accepting any responsibility for his actions. Today, about 18 months later, he writes:

"I'm sorry for all the trauma...I put the victim, my family, and the innocent bystanders through. It wasn't the right thing to do, and I think about it every night before I go to sleep. I think about what I could have done differently, and how I shouldn't have done it at all."

In the past 18 months, he has already matured in huge ways, gaining the ability to think critically about himself, recognize how his choices affect everyone around him, and learn how he can act more consciously. Because Mr. Woodford's brain – like all young people his age – is growing more mature so quickly, a below guideline sentence will serve all the goals of sentencing for him: reflecting the seriousness of the offense, protecting the public during the period of time that he grows and matures, and firmly teaching him the lesson that he does not want to end up like the older men at MDC. For Mr. Woodford, who has never served any prior adult prison sentences, a below guideline sentence, will still be exceedingly lengthy and have a strong impact on him and his future.

B. This Court should also take into account time spent at MDC without heat and electricity.

As this Court is no doubt aware, Mr. Woodford – 18 years old and recently in an adult jail for the first time in his life – was detained in the MDC during a period when the jail was unable to provide habitable conditions. For an entire week in

& Steven W. Anderson, *The Frontal Lobes*, in *Clinical Neuropsychology* 404, 434 (Kenneth M. Heilman & Edward Valenstein eds., 4th ed. 2003) (one "hallmark of frontal lobe dysfunction is difficulty making decisions that are in the long-term best interests" of the individual); *see also* Elizabeth R. Sowell et al., *In Vivo Evidence for Post-Adolescent Brain Maturation in Frontal and Striatal Regions*, 2 *Nature Neurosci.* 859, 860 (1999) (frontal lobes are essential for planning and organization); *see also, e.g.*, Elkhonon Goldberg, *The Executive Brain: Frontal Lobes and the Civilized Mind* 23, 24, 141 (2001); B.J. Casey et al., *Structural and Functional Brain Development and its Relation to Cognitive Development*, 54 *Biological Psychol.* 241, 244-246 (2000).

January and February of last year, during the sub-zero temperatures of last winter’s “Polar Vortex,” the jail went without power and heat. *See Annie Correal, No Heat for Days at a Jail in Brooklyn Where Hundreds of Inmates Are Sick and ‘Frantic,’ N.Y. Times, Feb. 1, 2019, available at https://nyti.ms/2sXCIQg; Complaint, Scott v. Quay, 19-cv-1075 (MKB) (E.D.N.Y. Feb. 22, 2019), ECF No. 1.* Mr. Woodford endured days of darkness, his cell illuminated only by the limited daylight that crept through the windows, and was denied hot food, or additional blankets or warm clothing, despite the frigid air inside the facility. The day the visiting room opened to attorneys, I visited Mr. Woodford. His hands were freezing.

The court should weigh the abject conditions to which Mr. Woodford was subjected when determining the “total harm and benefits to prisoner and society” that additional imprisonment will yield. *United States v. D.W.*, 198 F. Supp. 3d 18, 23 (E.D.N.Y. 2016); *see Davis v. Ayala*, 135 S. Ct. 2187, 2209 (2015) (Kennedy, J., concurring) (calling for heightened judicial scrutiny of the projected impact of jail and prison conditions on a defendant); *United States v. Mateo*, 299 F. Supp. 2d 201, 212 (S.D.N.Y. 2004) (reducing sentence where defendant’s pretrial conditions were “qualitatively more severe in kind and degree than the prospect of such experiences reasonably foreseeable in the ordinary case”); *United States v. Francis*, 129 F. Supp. 2d 612, 619-20 (S.D.N.Y. 2001) (reducing sentence in acknowledgment of “the qualitatively different, substandard conditions to which the Defendant was subjected” in pretrial detention). As Judge Furman recently commented in imposing a below-guidelines sentence in *United States v. Ozols*, No. 16-cr-692 (JMF) (S.D.N.Y.), “it’s pretty clear to me . . . that steps could have been taken, and taken more quickly, to address the problems [at the MDC]. And the bottom line is, the conditions that I read about are the conditions that one associates with a third world country and not a country like this, and nobody in detention . . . should have to endure that as the detainees did at the MDC.” *See also United States v. Bruney*, No. 18-cr-542 (PKC), ECF Nos. 22, 24 (granting variance for same reasons); *United States v. Lundi*, 17-cr-388 (DLI) (same). These conditions lend additional support to Mr. Woodford’s request for a below-guideline sentence.

* * *

Darell is a bright young man, who is doing everything in his control to grow into a responsible adult, who will never return to prison. He has managed to learn from a terrible situation. In the past 18 months, he has started to care about himself, realize how his actions hurt others, and appreciate that he has the tools to change his

community for the better. He wants “to show the kids from my community that there’s more than this,” more than just trying to “surviv[e].”

Today, he isn’t going to give up on himself; he wants to show Your Honor that his “life has value.” As Deanna puts it, he is so “young,” and needs “help, he needs resources,” but he has the chance to “change directions”: “We can’t give up on him.” A below guideline sentence will significantly punish him, while not giving up on him and his potential to succeed.

I respectfully urge your Honor to sentence Mr. Woodford below the guidelines.

Respectfully submitted,

/s/

Allegra Glashausser
Attorney for Darell Woodford
allegra_glashausser@fd.org
(212) 417-8739

Exhibit A

Dear Judge Matsumoto,

I want to start by saying sorry. I'm sorry to the victim, I'm sorry to the victim's family, I'm sorry to my family, and I'm sorry to all the innocent bystanders. I'm sorry for all the trauma, pain, and suffering I put them through. It wasn't the right thing to do, and I think about it every night before I go to sleep. I think about what I could have done differently, and how I shouldn't have done it at all.

What happened on August 30, 2018 wasn't planned. It happened in the heat of the moment. I felt like if I didn't do it to him, he would have done it to me. But that doesn't excuse what I did – not at all. If I was faced with the same situation today, I would have kept on going, I would have never stopped, because I know better now. I now know when I did that, I wasn't just hurting him. I hurt his family, my family, his friends, my friends, and myself.

Since the incident, I have learned that my actions have more meaning than I ever could have thought. I was young and naïve.

I was released from jail in 2018, just over a month after my 18th birthday. I served a year and a half. That sentence wasn't like my time here at MDC so far. It was all kids – no grown men. There was no one to talk to. No one can teach you anything if they don't know it themselves. Everyone was at my level in terms of life experience or lower. I thought I came out a better person, because there I learned to do construction and maintenance. I thought I was going to come home and be different – but I wasn't. Because my mindset wasn't different. No one taught me anything different, because no one knew any different.

Since I was a kid, I was in an environment of people who were young and didn't care. My family couldn't afford any better, and it became my life, normal, regular, because it was what I would see every day. My grandma would tell me about seeing people shot on the block, and I remember thinking it was normal. I didn't realize it's not normal.

My mom passed away when I was 5. I remember waking up in the morning, asking her for donuts. I don't know how she died. She fell off her bed, and started shaking. I was home alone with her. I didn't know what was going on at first, so I kept playing my game in the living room. When I started calling for her later on, and she didn't respond, I went to the neighbors, but they didn't answer. I called 911, and the ambulance came.

After she passed, life was vicious. The older I got, the more I realized she was really gone. And that's when I stopped caring about myself and my future. I didn't care about nothing.

My dad wasn't really around when I was growing up. He was always in and out, since he was selling drugs. He was locked up sometimes when I was younger. And I always wanted to be like him. I thought he was cool. I looked up to him because he was my father. We have the same name, and I thought I was supposed to be just like him. That's why I spent so much time on the street.

I lived with my grandma, and it was good. But she was always going to work. She always had 3 jobs. There was nothing she could do – she couldn't give me the attention I needed or wanted. Any time we'd do something fun, like go to the amusement park, she'd have to work extra hours and would be away even longer. She's a hard working woman. I respect her, and I love her.

I was 14 years old when my friend died. He was stabbed in a park. That's when I began to think I had to protect myself at all times, and I remember thinking I would always get someone before they get me. To me, at the time, protecting myself meant carrying a gun, and always staying in a group of friends.

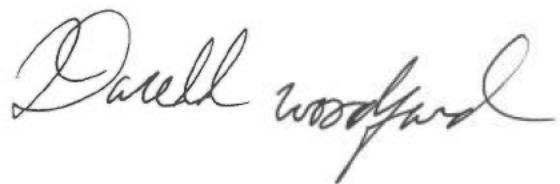
Before August 30, 2018, I did not take the time to think about the ways my upbringing, and my environment, impacted me. I do now. Before August 30, 2018, I thought of myself – but only how to protect myself. I did not take the time to think about my future, and how I could mess it up. I used to think of the saying, "the good die young." I didn't want to die young, so I thought I was doing what I had to. For me, life was about surviving.

I now know what I did wasn't surviving. MDC is not surviving. I just made everything worse.

Before August 30, 2018, I never thought my life had any value. No one had ever told me my life had value. Talking to older guys here, talking to my family, my friends, even my fans that I didn't even know I had, showed me my life had value.

Judge, if you give me the chance, I will show you better than I could ever tell you that my life has value to society. When I get out, I want to continue my career as a rapper, and I want to give back. I want to show the kids from my community that there's more than this. I hope to use my talents to lead by example, and show how I came from this situation stronger and smarter. I will not put myself in any predicament to be here again.

Since we never really had the chance to speak to each other, I hope you now know a little more about who I am as a person, and give me the chance to prove I'm more than the charges on that paper. Thank you for taking the time to read this.



A handwritten signature in black ink, appearing to read "Darrell Woodard". The signature is fluid and cursive, with "Darrell" on top and "Woodard" below it, though the two words are somewhat interconnected in the script.

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February 17, 2020

Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Dear Judge Matsumoto,

My name is Rachel Bass and I am the chief paralegal at the Federal Defenders of New York. This is my third year working in the office, and Darell Woodford is one of the hundreds of clients that I have had the privilege of working for. He is the first client I've written a letter of support for.

Darell was 18 years old when I met him, and like many 18 year olds, he was uncommunicative. Of course, it is hard to blame an individual for behaving like that when you're a teenager being held at a men's facility, meeting a stranger who is asking about some of the most traumatic events of your life within the first hour of meeting. On first glance he also presents like a much older, tougher person. When we would meet, I would have to remind myself he was only 18 years old.

Luckily for me, and all who know Darell, he is not the same individual he was when I first met him. Now, he seems to know everyone at MDC, and everyone respects him. Often when I am in the visiting room at the prison to meet with him, he's engaged in long conversations with the correctional officers. Other clients of mine that see us talking always tell me that Darell is one of their favorite people, they call him "family," or talk about how great of a rapper he is. He has taken GED classes, classes on emotional management, and begun to make good use of his time. And while I have not had the privilege of hearing any of his new music, it is clear from his knowledge on the subject, and what I have heard from others, that he has talent.

Darell's clear ability to connect with others in a meaningful way is a revelation to me, and not simply because it is a striking contradiction to the child I met in November 2018. As you know from the paperwork, Darell's mom passed away when he was around 5 years old, and his dad was not present for his childhood. To this day, his dad is an absent figure. Throughout the case, I've spoken with his father twice – a shockingly low amount of times given the situation. I am in regular communication with his aunt, who is only a few years older than him. And while they may appear as siblings, she has been the person to look out for Darell since he's been arrested.

I am not in any way trying to imply that Darell had no control over the events that brought him here. He and I both know that he did, and have talked about the ways it could have gone

differently. But when you take into account Darell's upbringing, lack of parental support, and the whole slew of traumatic events he's endured, it is no surprise he's here. His only example of an adult man was an absent father who was in and out of prison; he simply did not know any other possible future.

I truly believe that Darell had not taken the time to process his childhood, the ways it's impacted him, and how it plays into his actions until this case. And now that he's begun this process, I trust that he is moving in the right direction. Darell and I had a particularly challenging conversation recently, where we spoke in detail about his mother's death, his father's absence, and how his grandmother who raised him was always working. He shared information about his friend's death, and what it meant to survive in his childhood environment. Over and over again, he would speak about how he could not have had this conversation with me a year ago. To both him and me, it showed an incredible amount of growth.

His growth is apparent in numerous other ways. Darell and I have mature conversations about race relations in the United States, and the stark differences between an upbringing like mine – as a white woman raised in the suburbs – and his. We have talked about the 2020 presidential election, and the influence of rappers who engage with current events. Darell no longer comes across as a child who does not care about his future or the future of the world – it is more than evident that Darell cares.

He has talked to me about why he had “stopped caring.” After his mom passed away, with no encouragement from family, Darell never learned how he could live a meaningful life. He was never told it was important. It is clear from our time together that Darell has learned why his actions, and his life overall, are important. This is the most significant change in Darell since we have started working together. And with this knowledge, I know that Darell will work hard to avoid any situation that would place him back in prison.

I understand I am writing from his attorney's office, and that I only know Darell in a professional capacity. But given his familial situation, I feel I am one of the few people outside of MDC who has been able to see how Darell has changed, and put it in writing. And I feel lucky to be one of those people. Darell has shown me how people can live lives filled with tragedy but still learn how to find value in it.

Thank you for reading this.

Sincerely,



Rachel Bass, Chief Paralegal
The Federal Defenders of New York, Inc.

February 13, 2020

Dear Judge Matsumoto,

My name is Deanna Woodford, and I am Darell Woodford's aunt. My mother is his father's mother. I am currently in school for a bachelor's degree in social work. Darell and I are six years apart in age.

Darell lost his mom when he was around 5 years old. Ever since then, he's lived with my mom and me. Even though we're aunt and nephew, we're more like brother and sister. Sometimes I feel like I took on the sister role and the mother role at the same time. My mom worked a lot, and his father was going through his own stuff, so it was me and Darell. I took him out, picked him up from school, helped him with his homework, and looked after him. That's how we got so close. We really grew up together, and there were times I really had to take care of him.

Throughout his childhood, Darell's father was working a lot. He didn't live in New York when Darell lost his mom. He would try to come back and forth, and do as much for Darell as he could. He wasn't there physically, but would try to support him emotionally and financially. Darell has one uncle (my brother) who would try to take on the father role as well, but he was already in college, so it was hard for him.

Darell losing his mom at such a young age definitely hurt him. On top of that, not really having his father there, I feel like that messed with him. I do think his parents not being there affected his behavior. He tried to be a good kid, but he would look around and see people with their parents, and that definitely upset him. He's never really explained to me how he felt. I knew he felt bad though, because of how sad he would get.

It was a shock to me when Darell started to hang around the other kids who were in this situation. Darell wasn't raised to be rowdy, or disobedient. But it was clear what was going on with him. He was trying to escape, to cope with what was bothering him, and he didn't know how to express himself. He was looking for acceptance while trying to find himself. And it wasn't that his family didn't accept him, but he knew that I never lost my mom, and maybe he thought I couldn't understand. He was trying to find people to connect with, and a place of belonging. And in the environment we were raised in, it's common to find people who don't have their dads in their life, or their moms. And unfortunately, he found people to connect with in similar situations that were into bad things. I believe he did things he didn't want to do just to be accepted and feel a sense of belonging.

I've had conversations with Darell and after looking him in the face, I know this was a situation that really woke him up. It gave him the reality check he needed, and showed him this is not who he is, and this is not where he wants to be. I don't think Darell is a danger to society. Young people make mistakes. If he were to come home with another chance to fix himself, I know he'd do the right thing. This incident was the result of him going down a bad path. But now we talk about him bettering himself. He speaks to how he doesn't want to keep going back to a negative space.

Darell is really smart. He knows math better than I do! And I know he wants to go back to school. If he were to go back for a topic he likes, like music, that would be really good for him, and

he would do well. Darell wants to do better. This experience was enough for him. He's not one of those people who's going to keep going back. He's made his mistakes, and he's young, but he's starting to make a change. And he has his entire life ahead of him.

When he gets out, I am going to be even more supportive of him than I am now. I plan to be more on top of what he is doing. I don't want to treat him like a kid, but I want him to feel safe and comfortable and like he can come to me to talk to me. If he needs help with how to get into school, how to apply for jobs, I will be there to help him. I will never deny him support. I'm trying to set a good example for him, and I'm trying to show him that I understand. But also that if I can do better, he can do better too. We came from the same family, I want him to see what is possible. And that's what he needs -- someone in his family, close to home, that can show him that even if you're going down the wrong path you can still change directions. He has the potential to do better.

I understand as a judge the position you are in. You are trying to keep whoever is a danger to society out of the way. But given what he has been through, Darell deserves a second chance. Darell needs help, he needs resources. He does not need more time in prison. And we can't give up on him. He's so young, and he has the chance to fix his life. When he gets out, I know he will be the one to prove that you can change your life around after situations like this.

Thank you for reading this.

Sincerely,

Deanna Woodford

Maxine Middleton



January 23 2020.

Judge Kyo A. Matsumoto.

Dear Judge Matsumoto. My name
is Maxine Middleton and I am the
grandmother of Alavell T. Duont Worlford. His
mother died when he was 4 years old and
I was his legal guardian until he became
13. He was a great child with wonderful
manners. He always had trouble dealing
with the loss of his mom so I seek
counseling for him. He is very respectful
to me and his 5 siblings. He has always
helped me with anything when I called him
and he always helped take care of his
siblings; I always encourage him to look
for an interest and focus on it and work
hard. He loves music and wants to try and
pursue a career in it. I'm also discussing
his return to school in the future. There are options
that we have talked about in detail. Thank you
Maxine Middleton

Dear Judge Matsumoto,

January 28, 2020

My name is Celaine Beyoncé Jean, and I have been Darell Woodford's best friend for the longest time now. Darell is warm hearted all the way. There have been times when I was down bad and was in shambles, losing myself, and he got me back in the snap of a finger. He's an extremely encouraging person in that way. There was this one time I was stuck in Jersey, and he was in Brooklyn. He helped me get home, all the way to Chestnut Ridge. He's always reliable, and willing to help.

One thing about Darell is that when he loves, he loves hard, and he gives you chances after chances. He's been done wrong a few times that I know of and that didn't make him change the way he treats other people. Darell hasn't always had it easy, not everything was handed to him. That can go for everybody, but this explains Darell's situations in life. He has lost so many friends and family members.

Darell been in prison before, even though he's young. Young kids do stupid things because of their surroundings, or from trying to follow the head of the group. I told him to stay away from people who are not persuading you to do better. When he gets out, I know he'll take things more seriously. I think he will change the people he surrounds himself with, since he knows that his environment is the root of the issue. It impacts his actions.

Darell and I have huge plans for the future. We're talking about opening up a business together! I want him to go through college, and get a degree so he can strive for a career after he finishes his case. I plan on being here for him through his

future and following mine like I am now. I know his heart, so I won't let him down. He feels so bad and sometimes can't sleep at night. That hurts me so much. He regrets so many things and I always tell him to make the best out of the situation. I pray for him every night. Please, your Honor, if with any kindness of your heart and you felt this a little bit please hear out what I'm trying to say. Thank You.

Love , Celaine B. Jean

February 3, 2020

Dear Judge Matsumoto,

Please be advised that this letter is being written on behalf of Darell Woodford. I have known Darell for over 10 years as a friend of the family, and I have had the pleasure of watching him grow into a bright, intelligent, loyal, caring and loving young man. Darell is adored and loved by many, he is always willing to help someone who is in need, which can be looked at a positive and negative attribute as he may place himself in unfortunate situations to help someone else. Darell is a hard worker who goes the extra mile to get the job done.

I know that his family is devastated by these unfortunate turns of events, as am I. This is so unexpected and out of character from the Darell that I know. This unfortunate situation can and will impact his future, which he understands. He wants to learn and grow from this. Darell aspires to do great things in the future, as he continues to be grow into an amazing young man and I ask that you give him the opportunity to do so. Thank you.

Best Regards,

Ms. Nicole Ellington, MHC

Exhibit B

U.S. Department of Justice
Federal Bureau of Prisons
MDC Brooklyn Education Department

Presents this Certificate to

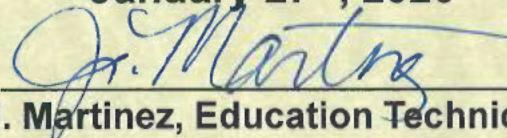
Darrell Woodford

In recognition of your completion of

GED Math

MDC Brooklyn

January 27th, 2020


J. Martinez
J. Martinez, Education Technician

MDC Brooklyn

Recreation Department

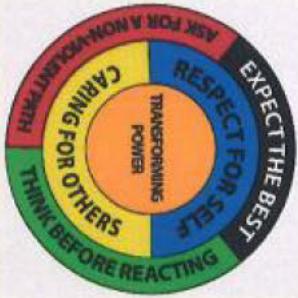
Darell Woodford

* Has Successfully Completed *

Alternative to Violence Program

At MDC Brooklyn PRISONS
This certificate is hereby issued on 1st day of August, 2019

C. Munoz
Recreation Specialist



MDC Brooklyn

Recreation Department

This is to Certify that

Darell Woodford

Has Successfully Completed:

CARD MAKING CLASS

At MDC Brooklyn

This certificate is hereby issued this 5th day of June 2019

R. SIMON

Recreation Specialist

